

**UNITED STATES OF AMERICA**  
**Plaintiff,**

**Case No.: 2:19-cr-00013**

**Chief Judge Waverly D. Crenshaw, Jr.**

Ms. Georgianna A.M. Giampietro, the defendant, through undersigned counsel, respectfully submits this Preliminary Witness List in advance of trial, which is currently scheduled for September 20, 2021.

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a regular user would not perceive that the Telegram secret chat app would involve the destruction of documents. Mr. Connor will offer the opinion that the defendant's use of the Telegram app was consistent with normal usage of the app, with one exception, that the defendant on occasion would use the screen shot feature on her mobile device to create a photographic image of the conversations occurring in the secret chat. Mr. Connor will offer the opinion that there is no evidence that the defendant deleted any of these photos taken of conversations. Mr. Connor will also testify with regard to the defendant's alleged deletion of social media account. Specifically, Mr. Connor will testify that deletion of social media accounts is a common practice similar to changing one's phone number. to prevent unwanted individuals from further communications. Mr. Connor will also serve as a foundational witness to documents recovered from the forensic images of the defendant's devices that have not been separately provided to the defendant.

Respectfully submitted this 4th day of August, 2021.

By: /s/ Charles Swift  
Charles D. Swift,  
*Pro Hac Vice* Attorney for Giampietro  
CLCMA  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4th day of August, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift  
Charles D. Swift, *Pro Hac Vice*  
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